

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311 Honorable Marianne O. Battani
In Re: Occupant Safety Systems	2:12-cv-00600
In Re: Alternators	2:13-cv-00700
In Re: Anti-Vibrational Rubber Parts	2:13-cv-00800
In Re: Windshield Wipers	2:13-cv-00900
In Re: Radiators	2:13-cv-01000
In Re: Starters	2:13-cv-01100
In Re: Automotive Lamps	2:13-cv-01200
In Re: Switches	2:13-cv-01300
In Re: Ignition Coils	2:13-cv-01400
In Re: Motor Generator	2:13-cv-01500
In Re: Steering Angle Sensors	2:13-cv-01600
In Re: HID Ballasts	2:13-cv-01700
In Re: Inverters	2:13-cv-01800
In Re: Electronic Powered Steering Assemblies	2:13-cv-01900 2:13-cv-02100
In Re: Fan Motors	2:13-cv-02200
In Re: Fuel Injection Systems	2:13-cv-02300
In Re: Power Window Motors	2:13-cv-02400
In Re: Automatic Transmission Fluid Warmers	2:13-cv-02500 2:13-cv-02700
In Re: Valve Timing Control Devices	2:13-cv-02800
In Re: Air Conditioning Systems	2:14-cv-02900
In Re: Windshield Washer Systems	
In Re: Constant Velocity Joint Boot Products	
THIS DOCUMENT RELATES TO:	
Direct Purchaser Actions	
Dealership Actions	
End-Payor Actions	

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR SUBMISSION OF
GLOBAL ORDERS**

Before the Special Master is Direct Purchaser Plaintiffs (“DPPs”), Dealership Plaintiffs (“Dealers”) and End-Payor Plaintiffs (“EPPs”) (collectively, “Plaintiffs”) Motion for an order directing that the following three global orders shall be submitted in each of the above-captioned actions and all future cases filed by Plaintiffs that are coordinated as part of *In re Automotive Parts Antitrust Litigation*, MDL 2311: (1) the Stipulation and Order Regarding Production of Electronically Stored Information and Hard Copy Documents (“Global ESI Order”); (2) the Stipulation and Order Regarding Non-Discoverability of Certain Expert Materials and Communications (“Global Expert Order”); and (3) the Stipulated Agreement and Order Regarding Preservation of Documents, Electronically Stored Information, and Other Tangible Items (“Global Preservation Order”).

Because good cause exists therefor, the Special Master hereby **GRANTS** the Motion. The parties shall file one Global ESI Order, Global Expert Order and Global Preservation Order in each of the above-captioned actions within 21 days of entry of this Order.¹

IT IS SO ORDERED.

Dated: June __, 2015

GENE J. ESSHAKI, Special Master

¹ The Global Preservation Order shall be entered in the *Occupant Safety Systems* case, 2:12-cv-00600. The Global Expert Order and Global ESI Order shall not be entered in *Occupant Safety Systems*, 2:12-cv-00600 because orders have already been entered in that action.